

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No.: 2019-002099

**RECEIVED**

**Sep 08 2020**

**SC Court of Appeals**

Machelle Smith.....Appellant,

-v-

Columbia Sussex Corporation d/b/a Hilton Head Marriott Resorts and Spa;  
Columbia Sussex Management, LLC; and,  
Columbia Properties Hilton Head, LLC.....Respondents

MOTION FOR EXTENSION OF TIME

Pursuant to Rule Rule 240 and Rule 263, SCACR, Appellant Machelle Smith (“Appellant”) respectfully moves this Court for an Order extending the deadline for her to reply to Respondents Columbia Sussex Corp. d/b/a Hilton Head Marriott Resorts and Spa, Columbia Sussex Management, LLC, and Columbia Properties Hilton Head, LLC’s Initial Brief by three (3) weeks. The Reply to Respondents’ Initial Brief was due to be filed and served September 8, 2020. Respondents’ Initial Brief was mistakenly served on another attorney with a similar name in the undersigned’s law firm, and undersigned counsel did not learn that Respondents’ Initial Brief had been filed until September 8, 2020. Respondents consent to Appellant’s Motion.

[SIGNATURE PAGE TO FOLLOW]

I SO MOVE:

s/John E. Parker, Jr.  
John E. Parker, Jr. (SC Bar No.104225)  
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[jayparker@pmped.com](mailto:jayparker@pmped.com)  
**ATTORNEY FOR THE APPELLANT**

WE CONSENT:

s/ Christian Stegmaier,  
Christian Stegmaier,  
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COLLINS & LACY, P.C.  
P.O. Box 12487  
Columbia, S.C. 29211  
**ATTORNEYS FOR RESPONDENTS**

September 8, 2020  
Hampton, South Carolina

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Columbia Sussex Management, LLC; and,  
Columbia Properties Hilton Head, LLC.....Respondents

**PROOF OF SERVICE**

The undersigned certifies that a copy of the foregoing Motion for Extension has been served upon the following counsel of record by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 8<sup>th</sup> day of September, 2020.

Christian Stegmaier, Esquire  
COLLINS & LACY, P.C.  
Post Office Box 12487  
Columbia, S.C. 29211

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

September 8, 2020  
Hampton, South Carolina

BY:   
Claudia Cartier

September 8, 2020

John E. Parker, Jr.  
Direct Dial: (803) 943-2111  
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**VIA U.S. MAIL AND EMAIL**

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: *Machelle Smith v. Columbia Sussex Corporation d/b/a Hilton Head Marriott Resort & Spa; Columbia Sussex Management, LLC; and Columbia Properties Hilton Head, LLC***  
**Appellate Case No.: 2019-002099**

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Consent Motion for Extension of Time in the above matter. Please file the original and return on copy to our office in the envelope provided for you convenience.

Pursuant to the Supreme Court's Amended Order "re: Operation of the Appellate Courts During the Coronavirus Emergency" (2020-05-29-02, Appellate Case No. 2020-000447), we have not included any additional copies nor a filing fee for this Notice. If any additional copies or the filing fee are required, please let us know.

By copy of this letter, I am serving all counsel of record with a copy of the same.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated

Cc: Christian Stegmaier, Esq. [cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)

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